

ORIGINAL

NEW APPLICATION

Lance J.M. Steinhart, P.C.

Attorneys At Law

1725 Windward Concourse

Suite 150

Alpharetta, Georgia 30005



0000168649

Also Admitted in New York  
Email: info@telecomcounsel.com

Telephone: (770) 232-9200  
Facsimile: (770) 232-9208

February 11, 2016

**VIA OVERNIGHT DELIVERY**

Docket Control Center  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, Arizona 85007  
(602) 542-2237

Arizona Corporation Commission

DOCKETED

FEB 12 2016

DOCKETED BY

AZ CORP COMMISSION  
DOCKET CONTROL

2016 FEB 12 P 1:06

RECEIVED

Re: IM Telecom, LLC d/b/a Infiniti Mobile

Dear Sir/Madam:

T-20951A-16-0051

Enclosed please find for filing an original and thirteen (13) copies of IM Telecom, LLC d/b/a Infiniti Mobile's Petition for Designation as an Eligible Telecommunications Carrier in the State of Arizona on a Wireless Basis (Low-Income Only).

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you for your attention to this matter.

Respectfully submitted,

Burton F. Peebles, Esq.

Associate Attorney

Lance J.M. Steinhart, P.C.

1725 Windward Concourse, Suite 150

Alpharetta, Georgia 30005

*Attorneys for IM Telecom, LLC d/b/a Infiniti Mobile*

Enclosures

cc: Trevan Morrow  
Compliance Section, Arizona Corporation Commission  
1200 W. Washington St. Phoenix, AZ 87005

**BEFORE THE ARIZONA CORPORATION COMMISSION**

---

In the Matter of Petition of IM Telecom, LLC  
d/b/a Infiniti Mobile for Designation as an Eligible  
Telecommunications Carrier in the State of Arizona  
On A Wireless Basis (Low-Income Only)

---

)  
)  
)  
)  
)  
)  
)

Docket No. \_\_\_\_\_

**PETITION OF IM TELECOM, LLC D/B/A INFINITI MOBILE  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF ARIZONA ON A WIRELESS BASIS (LOW-INCOME ONLY)**

Lance J.M. Steinhart, Esq.  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
Attorneys at Law  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
E-Mail lsteinhart@telecomcounsel.com

*Attorneys for IM Telecom, LLC  
d/b/a Infiniti Mobile*

February 11, 2016

## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	UNIVERSAL SERVICE OFFERING.....	3
A.	Company Overview .....	3
B.	Proposed Lifeline Offering .....	4
C.	Plan Enrollment .....	5
D.	Prevention of Waste, Fraud and Abuse.....	6
E.	The Commission Has Jurisdiction to Designate Wireless ETCs .....	7
III.	INFINITI MOBILE SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC .....	8
A.	Infiniti Mobile Will Provide Service Consistent With the FCC's Grant of Forbearance from Section 214's Facilities Requirements .....	9
B.	Infiniti Mobile Is a Common Carrier .....	10
C.	Infiniti Mobile Will Provide All Required Services and Functionalities .....	10
1.	Voice Grade Access to the Public Switched Telephone Network.....	10
2.	Minutes of Use for Local Service .....	10
3.	Access to Emergency Services .....	10
4.	Toll Limitation for Qualified Low-Income Customers. ....	11
5.	Other Services.....	11
D.	Infiniti Mobile Will Advertise the Availability of Supported Services.....	11
E.	Infiniti Mobile Requests Designation Throughout its Service Area in Arizona.....	12
F.	Service Commitment Throughout the Proposed Designated Service Area.....	13
G.	Five-Year Network Improvement Plan.....	14
H.	Ability to Remain Functional in Emergency Situations .....	14
I.	Commitment to Consumer Protection and Service Quality.....	14
J.	Local Usage Requirement.....	14
K.	Equal Access Requirement .....	15
L.	Financial and Technical Capability .....	15
M.	Infiniti Mobile Will Comply with Certification and Verification Requirements .....	16
N.	Infiniti Mobile Will Comply With All Regulations Imposed By The Commission .....	16

IV.	DESIGNATION OF INFINITI MOBILE AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST .....	17
A.	Advantages of Infiniti Mobile's Service Offerings .....	17
B.	The Benefits of Competitive Choice.....	19
C.	Impact on the Universal Service Fund.....	19
V.	ANTI-DRUG ABUSE CERTIFICATION .....	20
VI.	CONCLUSION.....	21

## TABLE OF EXHIBITS

	<u>Exhibit</u>
Certification of Trevan Morrow, COO for IM Telecom, LLC d/b/a Infiniti Mobile .....	1
Proposed Lifeline Offering .....	2
Sample Customer Enrollment Form .....	3
Infiniti Mobile's FCC-Approved Compliance Plan .....	4
Sample Advertisement .....	5
Coverage Area .....	6

**BEFORE THE ARIZONA CORPORATION COMMISSION**

**In the Matter of Petition of IM Telecom, LLC  
d/b/a Infiniti Mobile for Designation as an Eligible  
Telecommunications Carrier in the State of Arizona  
On A Wireless Basis (Low-Income Only)**

Docket No. \_\_\_\_\_

**PETITION OF IM TELECOM, LLC D/B/A INFINITI MOBILE  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF ARIZONA ON A WIRELESS BASIS (LOW-INCOME ONLY)**

## I. INTRODUCTION

IM Telecom, LLC d/b/a Infiniti Mobile (“Infiniti Mobile” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)<sup>1</sup>, Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),<sup>2</sup> and the rules and regulations of the Arizona Corporation Commission (“Commission”), hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) on a wireless basis in the State of Arizona. Infiniti Mobile seeks ETC designation solely to provide wireless Lifeline service to qualifying Arizona consumers; the Company will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of providing service to high-cost areas.<sup>3</sup> As demonstrated herein, and as certified in Exhibit 1 to this Petition, Infiniti Mobile meets all the statutory and regulatory requirements for designation as an ETC in the State of Arizona, including the new

<sup>1</sup> 47 U.S.C. § 214(e)(2)

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

<sup>3</sup> Given that Infiniti Mobile only seeks support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

requirements outlined in the FCC's *Lifeline and Link Up Reform Order*.<sup>4</sup> Rapid grant of Infiniti Mobile's request, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline services to low-income Arizona residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition for ETC designation.

All correspondence, communications, pleadings, notices, orders, and decisions relating to this Petition should be addressed to:

Lance J.M. Steinhart  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
E-Mail: lsteinhart@telecomcounsel.com

*Attorneys for IM Telecom, LLC d/b/a Infiniti Mobile*

---

<sup>4</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

## **II. UNIVERSAL SERVICE OFFERING**

### **A. Company Overview**

Infiniti Mobile is an Oklahoma Limited Liability Company.<sup>5</sup> Its principal office is located at 1705 South Baltimore Ave., Tulsa, Oklahoma 44119. Infiniti Mobile will provide wireless telecommunications services to consumers by using the Sprint Spectrum L.P. ("Sprint"), Verizon Wireless ("Verizon"), and T-Mobile USA, Inc. ("T-Mobile") networks to offer nationwide service. Infiniti Mobile obtains from Sprint, Verizon, and T-Mobile the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator ("MVNO"). Infiniti Mobile has been designated as an ETC in Oklahoma, and the Company currently has applications for ETC designation pending before the FCC for the states of Alabama, Connecticut, Delaware, Florida, Maine, New Hampshire, New York, North Carolina, Tennessee, Texas, as well as the District of Columbia and the Commonwealth of Virginia; before the Georgia Public Service Commission, for designation in Georgia; before the Vermont Public Service Board, for designation in Vermont; before the Kansas Corporation Commission, for designation in Kansas; before the Wisconsin Public Utility Commission, for designation in Wisconsin; before the California Public Utilities Commission, for designation in California; before the South Dakota Public Utilities Commission, for designation in South Dakota; and before the State of Nevada Public Utilities Commission, for designation in Nevada. No such petitions have been denied.

Infiniti Mobile's prepaid wireless services are affordable, easy-to-use, and attractive to low-income consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family, as well as for contacting prospective employers. Infiniti Mobile offers consumers a

---

<sup>5</sup> Infiniti Mobile was organized in the State of Oklahoma on February 9, 2012.



variety of simple and affordable calling plans, a variety of ancillary services and top-up options, easy-to-use handsets, and high-quality customer service. Given its pricing and marketing strategy and the demographics of other, similar MVNOs' customers, Infiniti Mobile anticipates that many of its customers will be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. Infiniti Mobile neither conducts credit checks nor requires customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

By providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or who were previously ignored by traditional carriers, Infiniti Mobile will expand the availability of wireless services to many more consumers, which is the principal reason that Congress established the universal service program.

**B. Proposed Lifeline Offering**

Infiniti Mobile has the ability to provide all services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) throughout Arizona. The Company will provide Lifeline services to qualifying customers requesting this service throughout Arizona pursuant to the universal service program and in accordance with 47 C.F.R. § 54.202(a)(1). Infiniti Mobile intends to offer consumers exceptional value and competitive amounts of voice usage at all price points.

The Company's Lifeline service offering will provide customers with the same features and functionalities enjoyed by all other Infiniti Mobile prepaid customers. Infiniti Mobile's Lifeline offering proposes to give eligible Lifeline customers expanded access to wireless service. Infiniti Mobile will apply the Lifeline credit to its wireless plan as outlined in Exhibit 2. Exhibit 2 is a summary table of the Company's proposed Lifeline service offering. All Infiniti Mobile Lifeline customers will also receive a free handset as well as voicemail, caller I.D., call

waiting, call forwarding, and 3-way calling features at no additional charge. Customers may use their minutes to place domestic long-distance calls at no additional charge. Calls to 911 emergency services and Infiniti Mobile customer service via 611 are always free, regardless of service activation or availability of minutes. No activation fee will apply to Lifeline customers in Arizona. As Exhibit 2 demonstrates, the Company's Lifeline offerings will allow feature-rich mobile connectivity for qualifying subscribers at low, Lifeline rates and without the burden of credit checks or service contracts. Infiniti Mobile's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are nonetheless concerned about usage charges or long-term contracts.

### **C. Plan Enrollment**

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website ([www.infinitimobile.com/](http://www.infinitimobile.com/)), which will contain information regarding the Company's Lifeline service plans, including a detailed description of the programs and state-specific eligibility criteria. Customers may then request that an enrollment form be mailed to them, or such customers can download a form from the Internet. The certification form currently used by the Company in Oklahoma, a sample of which is attached hereto as Exhibit 3, will explain in clear, easily understandable language that:

- (i) Lifeline is a federal benefit;
- (ii) Lifeline service is available for only one line per household;
- (iii) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses;
- (iv) households are not permitted to receive benefits from multiple providers;
- (v) that violation of the one-per-household requirement would constitute a violation of the FCC's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government; and
- (vi) a Lifeline subscriber may not transfer his or her service to any other individual, including another eligible low-income consumer.

The Company's certification form will also require all consumers, at sign up and annually thereafter, to provide the information and certifications, under penalty of perjury, required by revised 47 C.F.R. § 54.410(d).<sup>6</sup> For more detailed enrollment information, *see* Exhibit 4. Infiniti Mobile will annually re-certify the continued eligibility of all of its subscribers.

**D. Prevention of Waste, Fraud and Abuse**

Infiniti Mobile recognizes the importance of safeguarding the USF. The Company will utilize the Universal Service Administrative Company's ("USAC") National Lifeline Accountability Database ("NLAD") in Nevada to add, enroll, edit, and de-enroll subscribers in its Lifeline program. The Company has also implemented the following 60-day non-usage policy in an effort to avoid waste, fraud, and abuse of the program. Infiniti Mobile will not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period.<sup>7</sup> Infiniti Mobile will notify its subscribers at service initiation about the non-transferability of the phone service, its usage requirements, and the de-enrollment as well as deactivation that will result following non-usage in any 60-day period of time.<sup>8</sup> An account will be considered active if, during any 60-day period, an authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to an existing pre-paid Lifeline account; completes an outbound call; initiates an outbound SMS or data usage; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.<sup>9</sup> Infiniti Mobile will provide the subscriber 30 days'

---

<sup>6</sup> *See Lifeline and Link Up Reform Order* page 227–29.

<sup>7</sup> *See Lifeline and Link Up Reform Order* at ¶ 257.

<sup>8</sup> *See id.*

<sup>9</sup> *See id.* at ¶ 261.

notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage; such notice may be given after 30 days of non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, Infiniti Mobile has contracted with CGM, LLC, of Roswell, Georgia, a lifeline service bureau, to edit all subsidy request data. CGM will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described above, Infiniti Mobile ensures that it does not over-request from support funds.

**E. The Commission Has Jurisdiction to Designate Wireless ETCs.**

Section 214(e)(2) of the Act provides state public utility commissions with the "primary responsibility" for the designation of ETCs.<sup>10</sup> Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of section 214(e)(1). Therefore, the Commission has the authority to designate Infiniti Mobile as an ETC. Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC status to an applying carrier, including any requesting wireless carrier. Infiniti Mobile recognizes that Section 214(e)(1)(A) of

---

<sup>10</sup> 47 U.S.C. § 214(e)(2).

the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC's Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier's services. However, the FCC granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.<sup>11</sup> Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: "[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section." As such, the Commission is required by Section 10(e) to act in accordance with the FCC's grant of forbearance, and therefore may not apply the facilities-based requirement to Infiniti Mobile. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant Infiniti Mobile's request for designation as an ETC throughout the State of Arizona.

### **III. INFINITI MOBILE SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC**

Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support." Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.<sup>12</sup> Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either through using their own facilities or a combination of their own facilities and the resale of another carrier's services, except where the

---

<sup>11</sup> See *Lifeline and Link Up Reform Order* at ¶ 368.

<sup>12</sup> See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) ("USF Order").

FCC has forbore from the “own facilities” requirement. Applicants also must commit to advertise the availability and rates of such services.<sup>13</sup> As detailed below, Infiniti Mobile satisfies each of the above-listed requirements.

**A. Infiniti Mobile Will Provide Service Consistent with the FCC’s Grant of Forbearance from Section 214’s Facilities Requirements**

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as Infiniti Mobile. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:<sup>14</sup>

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.

Infiniti Mobile availed itself of the FCC’s grant of blanket forbearance. In accordance with the *Lifeline and Link Up Reform Order*, Infiniti Mobile filed its Compliance Plan, which the FCC approved on August 8, 2012. A copy of the Company’s FCC-approved Compliance Plan is attached hereto as Exhibit 4. Infiniti Mobile commits to providing Lifeline service in Arizona in accordance with said Compliance Plan.

---

<sup>13</sup> See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

<sup>14</sup> See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373 and 379.

**B. Infiniti Mobile Is a Common Carrier**

CMRS providers like Infiniti Mobile are treated as common carriers.<sup>15</sup>

**C. Infiniti Mobile Will Provide All Required Services and Functionalities**

Through its arrangements with Sprint, Verizon, and T-Mobile, Infiniti Mobile is able to provide all of the services and functionalities required by Section 54.101(a) and Section 54.202(a) of the FCC's Rules (47 C.F.R. §§ 54.101(a) and 47 C.F.R. § 54.202(a)) including the following:

**1. Voice Grade Access to the Public Switched Telephone Network**

Infiniti Mobile provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from Sprint, Verizon, and T-Mobile.

**2. Minutes of Use for Local Service**

As part of the voice grade access to the PSTN, an ETC must provide minutes of use for local service at no additional charge to end-users. The FCC has not specified a minimum amount of local usage that an ETC must offer.<sup>16</sup> Infiniti Mobile offers a variety of rate plans that provide its customers with minutes of use for local service at no additional charge.

**3. Access to Emergency Services**

Infiniti Mobile provides 911 and E911 access for all of its customers to the extent local governments in its service area have implemented 911 or E911 systems. Infiniti Mobile also

---

<sup>15</sup> *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); *see also* *PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, . . . all mobile telephone services and resellers of such services.").

<sup>16</sup> *See e.g., In the Matter of Federal-State Joint Board on Universal Service*, Recommended Decision, 15 FCC Rcd 7331 (2002).

complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

#### **4. Toll Limitation for Qualified Low-Income Customers**

In its *Lifeline and Link Up Reform Order*, the FCC provided that toll limitation would no longer be deemed a supported service.<sup>17</sup> "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."<sup>18</sup> Nonetheless, Infiniti Mobile's offering inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. Infiniti Mobile's service, moreover, is not offered on a distance-sensitive basis and local and domestic long-distance minutes are treated the same. Infiniti Mobile will not seek reimbursement for toll limitation service.

#### **5. Other Services**

While no longer required by FCC rules, Infiniti Mobile provides dual-tone multi-frequency ("DTMF") signaling to expedite the transmission of call set-up and call-detail information throughout the network; single-party service for the duration of each telephone call and not multi-party (or "party-line") services; access to operator services; and the ability to make interexchange, or long-distance, telephone calls.

##### **D. Infiniti Mobile Will Advertise the Availability of Supported Services**

Infiniti Mobile will broadly advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2). Infiniti Mobile's advertising will comply with the requirements set forth in the *Lifeline and Link*

---

<sup>17</sup> See *Lifeline and Link Up Reform Order* at ¶ 367.

<sup>18</sup> See *id.* at ¶ 49.



*Up Reform Order*, as outlined in the Company's FCC-Approved Compliance Plan.<sup>19</sup> The Company will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach including, but not limited to, telephone marketing, direct mailing, and face-to-face tent events. The Company will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer segment. Infiniti Mobile may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and the Company may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service.

In addition, Infiniti Mobile may utilize a network of retail partners to help promote the availability of its Lifeline plans, especially those retail outlets frequented by low-income consumers. Infiniti Mobile will provide retail vendors with signage to be displayed wherever Company products are sold, and the Company will provide such retail vendors with printed materials describing the Company's Lifeline program.<sup>20</sup> The Company expects to be able to inform consumers of the availability of Lifeline service in a manner that will result in higher participation by qualified consumers than has been the case in the past.

**E. Infiniti Mobile Requests Designation Throughout Its Service Area in Arizona**

Infiniti Mobile is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, Infiniti Mobile is required to describe the geographic area(s) within which it requests designation as an ETC. Infiniti Mobile requests ETC designation statewide in all exchanges, including Federally Recognized Tribal Lands, to the extent that its

---

<sup>19</sup> See Exhibit 4; *see also Lifeline and Link Up Reform Order* at Section VII.F.

<sup>20</sup> See attached Exhibit 5 for a sample advertisement currently used in Oklahoma; upon designation as an ETC in Arizona, the Company will modify its advertisements to include all requires state-specific, program language.

underlying carriers have facilities and coverage.<sup>21</sup> Infiniti Mobile understands that its service area overlaps with rural carriers in Arizona, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because the Company seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. The Company does not seek, and will not accept, high-cost support. Therefore, designating Infiniti Mobile as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that "[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies."<sup>22</sup> The Commission may designate Infiniti Mobile as an ETC in non-rural areas that Infiniti Mobile serves without redefining the service areas of non-rural telephone companies. The Commission may designate Infiniti Mobile as an ETC in rural telephone company service areas upon a finding that such designation would serve the public interest.<sup>23</sup>

**F. Service Commitment Throughout the Proposed Designated Service Area**

Infiniti Mobile provides service in Arizona by reselling service, which it obtains from its underlying facilities-based provider. The provider's network is operational and largely built out. Thus, Infiniti Mobile will be able to commence offering its Lifeline service to all locations served by its underlying carriers very soon after receiving approval from the Commission. Infiniti Mobile commits to comply with the service requirements applicable to the support that it

---

<sup>21</sup> See Exhibit 6 for a description of the Company's coverage area.

<sup>22</sup> See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, Memorandum Opinion and Order, 16 FCC Rcd 48, 55 (2000).

<sup>23</sup> See 47 C.F.R. § 54.207(c).

receives.<sup>24</sup>

**G. Five-Year Network Improvement Plan**

As set forth in the *Lifeline and Link Up Reform Order*, a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC.<sup>25</sup>

**H. Ability to Remain Functional in Emergency Situations**

In accordance with 47 C.F.R. § 54.202(a)(2), Infiniti Mobile has the ability to remain functional in emergency situations. Through its agreements with its underlying carriers, Infiniti Mobile provides to its customers the same ability to remain functional in emergency situations as currently provided by Sprint, Verizon, and T-Mobile to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

**I. Commitment to Consumer Protection and Service Quality**

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards.<sup>26</sup> The Company commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. Specifically, Infiniti Mobile commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

**J. Local Usage Requirement**

An applicant for ETC designation is no longer required to demonstrate that it offers a

---

<sup>24</sup> See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a)(1)(i).

<sup>25</sup> See *id.* at ¶ 386.

<sup>26</sup> See 47 C.F.R. § 54.202(a)(3).

local usage plan that is “comparable” to the plan offered by the ILEC in the relevant service territory.<sup>27</sup> Nevertheless, not only will the Company’s offering be comparable to the underlying ILEC plans, but it will also exceed them in several respects. Infiniti Mobile will offer customers a certain amount of service free of charge. In contrast to the ILEC plans, which contain relatively small local calling areas, Infiniti Mobile customers can use these free minutes to place calls statewide (and even nationwide) because Infiniti Mobile does not constrict customers’ use by imposing a local calling area requirement. Infiniti Mobile will also provide Lifeline customers with E911 capabilities and access to voice mail, caller I.D., and call-waiting services at no cost. The very nature of the wireless phone, i.e. mobility, has a tremendous benefit to many consumers, a benefit to which a monetary value cannot be easily assigned.

**K. Equal Access Requirement**

The FCC’s Rules no longer require an applicant for ETC status to provide a certification that it acknowledges that the FCC may require it to provide equal access to long-distance carriers in the event that no other ETC is providing equal access within the service area.<sup>28</sup>

**L. Infiniti Mobile is Financially and Technically Capable**

Infiniti Mobile is financially and technically capable of providing Lifeline-supported services.<sup>29</sup> Infiniti Mobile has been in business since 2012 and currently provides service to both Lifeline and non-Lifeline customers. Infiniti Mobile already successfully provides wireless services in Oklahoma. Infiniti Mobile has not been subject to enforcement action or ETC revocation proceedings in any state. Infiniti Mobile is financially able to provide Lifeline-supported services; the Company does not, and does not intend to, offer exclusively

---

<sup>27</sup> See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a).

<sup>28</sup> See *id.*

<sup>29</sup> See *id.* at ¶ 387.

Lifeline-supported services—and the Company is therefore not exclusively dependent on USAC for its revenue. The result of Infiniti Mobile's efforts is that the Company is profitable and fully capable of honoring all its service obligations to customers and regulatory obligations to state and federal regulators. Furthermore, the senior management of Infiniti Mobile has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company. Infiniti Mobile will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carriers.

**M. Infiniti Mobile Will Comply with Certification and Verification Requirements**

Section 54.410 of the FCC's Rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Infiniti Mobile will certify and verify consumer eligibility in accordance with the FCC's requirements, with applicable Commission rules, and in accordance with its FCC-Approved Compliance Plan, which outlines how the Company will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*.

**N. Infiniti Mobile Will Comply With All Regulations Imposed By The Commission**

By this Petition, Infiniti Mobile hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Petition. The Company will comply with all requirements for expanded eligibility criteria, certification, verification and recordkeeping requirements in ACC Decision No. 67941. Infiniti Mobile will make the necessary payments on behalf of its Arizona customers to the federal USF and to the Arizona USF, as required in A.A.C. R14-2-1204(A) and (B). Upon Commission request, Infiniti Mobile is prepared to answer questions and present additional testimony or other evidence about its services within the State of Arizona.

#### **IV. DESIGNATION OF INFINITI MOBILE AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST**

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.<sup>30</sup> There is no question that designation of Infiniti Mobile as an ETC in Arizona will further the public interest by providing Arizona consumers, especially low-income consumers, with lower prices and higher-quality services. Many low-income customers in Arizona have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history, or intermittent employment, these consumers often lack the countless choices available to most consumers.

The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. Given this context, designating Infiniti Mobile as an ETC would significantly benefit low-income consumers eligible for Lifeline services in the State of Arizona—the intended beneficiaries of universal service.

##### **A. Advantages of Infiniti Mobile’s Service Offerings**

The public interest benefits of the Company’s wireless service include larger local calling areas (as compared to traditional wireline carriers); the convenience and security afforded by mobile telephone service; the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge; the ability to purchase additional usage at flexible and

---

<sup>30</sup> *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

affordable amounts in the event that included usage has been exhausted; 911 service; and, where available, E911 service in accordance with current FCC requirements. The Company's Lifeline customers will receive the same high-quality wireless services and exceptional customer service provided to all Company customers. Infiniti Mobile's Lifeline rate plans will allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber and without the burden of credit checks or contracts.

Infiniti Mobile's Lifeline program will provide low-income Arizona residents with the convenience and security offered by wireless services—even if their financial position deteriorates. Economic circumstances indicate that low-income individuals can greatly benefit from the advantages offered by the Company's Lifeline service, thus allowing those adversely impacted by the failing economy or job loss to have access to a free wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members.

It is also a commonly accepted fact that in today's market all consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be; allows a person seeking employment the ability to be contacted by potential employers; and provides end users with the ability to contact emergency service providers, regardless of location. Providing Infiniti Mobile with the authority necessary to offer discounted Lifeline services to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

Moreover, grant of Infiniti Mobile's Petition will serve the public interest in increasing the number of ETCs in Arizona. By granting ETC status to Infiniti Mobile, the Commission will enable Infiniti Mobile to increase the number of Arizona residents receiving Lifeline support,

thereby increasing the amount of USF money flowing into Arizona. In sum, ETC designation in the State of Arizona would enable Infiniti Mobile to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, Infiniti Mobile would provide “increased consumer choice, high-quality service offerings, and mobility,”<sup>31</sup> as well as the safety and security of effective 911 and E911 services.<sup>32</sup>

#### **B. The Benefits of Competitive Choice**

The FCC has acknowledged the benefits to consumers of being able to choose from among a variety of telecommunications service providers for more than three decades.<sup>33</sup> First, designation of Infiniti Mobile as an ETC will promote competition and innovation, spurring other carriers to target low-income consumers with service offerings tailored to their needs and to improve their existing networks to remain competitive, ultimately resulting in improved services to consumers. Second, designation of Infiniti Mobile as an ETC will help assure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.<sup>34</sup> Introducing Infiniti Mobile into the market as an additional wireless ETC provider will afford low-income Arizona residents a wider choice of providers and available services while creating a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

#### **C. Impact on the Universal Service Fund**

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given

---

<sup>31</sup> See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.

<sup>32</sup> See *id.* at 3391 ¶ 23.

<sup>33</sup> See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

<sup>34</sup> See 47 U.S.C. § 254(b)(1).



through a company such as Infiniti Mobile or through the Incumbent LEC operating in the same service area. Infiniti Mobile will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not enrolled in another ETC's Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link-Up Reform Order*, Infiniti Mobile will minimize the likelihood that its customers are not eligible or are receiving duplicative support, either individually, or within their household. Significantly, the Company's designation as an ETC will not increase the number of persons eligible for Lifeline support. Infiniti Mobile's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers. According to the FCC, "the additional choice and service options of another wireless reseller offering a service for low-income consumers represents a significant benefit for consumers and is in the public interest," and "[a] new entrant should incent existing wireless reseller ETCs to offer better service and terms to their customers, which provides additional evidence that forbearance in the context of the Lifeline program outweighs the potential costs."<sup>35</sup>

## **V. ANTI-DRUG ABUSE CERTIFICATION**

Infiniti Mobile certifies that no party to this Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

---

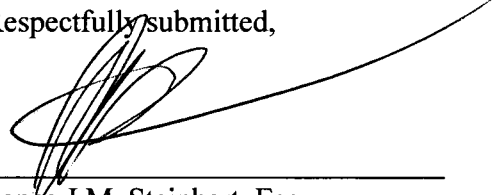
<sup>35</sup> See *Petition of i-wireless, LLC for Forbearance from 47 U.S.C § 214(e)(1)(A)*, Order, FCC 10-117 (rel. June 25, 2010) at ¶ 19.

**VI. CONCLUSION**

Based on the foregoing, designation of Infiniti Mobile as an ETC in the State of Arizona accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, Infiniti Mobile respectfully requests that the Commission promptly designate Infiniti Mobile as an ETC in the State of Arizona.

Respectfully submitted,



---

Lance J.M. Steinhart, Esq.  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
Attorneys at Law  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
E-Mail: lsteinhart@telecomcounsel.com

*Attorneys for IM Telecom, LLC  
d/b/a Infiniti Mobile*

February 11, 2016

**EXHIBIT 1**

**Certification of Trevan Morrow, COO of IM Telecom, LLC d/b/a Infiniti Mobile**

State of Oklahoma

)

County of Tulsa

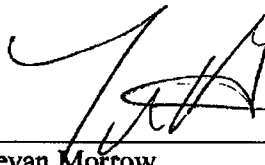
)

)

### Certification

Personally appeared before the undersigned, an officer duly authorized to administer oaths, Trevan Morrow, who first being duly sworn, deposes and states that he is the Chief Operating Officer of IM Telecom, LLC d/b/a Infiniti Mobile, Applicant in this Application, and has read the same and knows the contents thereof, and confirms that the statements made herein are true to the best of her knowledge and belief.

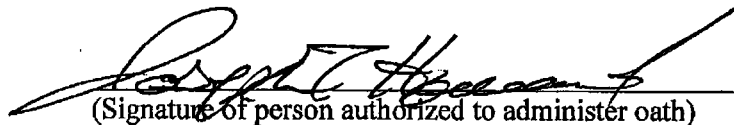
Dated: 1-26-16



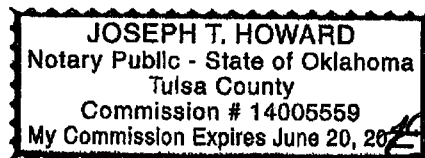
Trevan Morrow  
Chief Operating Officer  
IM Telecom, LLC d/b/a Infiniti Mobile

Subscribed and sworn to before me this 26 day of Jan, 2016.

(Notary Seal)

  
(Signature of person authorized to administer oath)

My Commission Expires: \_\_\_\_\_



## EXHIBIT 2

### Proposed Lifeline Offering

Plan	Minutes	Text	Data (MB)	Retail Price	Lifeline Discount	Net Cost to Lifeline Customer
Arizona Lifeline 250 Plan*	250	250	0MB	\$9.25	- \$9.25	\$0.00

\*Must be Eligible. Each month eligible Lifeline subscribers will receive 250 voice minutes and 250 text messages (totaling 500 units) for \$0.00 per month plus fees and taxes. There are no rollover minutes with this plan. Unused minutes will expire each month on the service expiration date. This plan is only available to Arizona Lifeline residents.

#### All Plans include the following:

- Free phone
- Free calls to 911 emergency services
- Free calls to Customer Service via 611
- Free access to Voicemail, Caller-ID, Call Waiting, Call Forwarding, and 3-Way Calling features
- Free Domestic Long Distance

**Additional Airtime:** Customers may purchase 100 minutes of additional airtime for voice calls for an additional \$5.00. Customers may also purchase an additional 100 text messages for \$5.00.

*\*\* In addition to the Arizona Lifeline 250 Plan, all Lifeline-eligible customers will be able to apply the \$9.25 federal Lifeline discount to any retail plans the Company should make available to non-Lifeline consumers. Such plans are subject to change and are viewable on the Company's website, <http://infinitimobile.com>.*

**EXHIBIT 3**

**Sample Customer Enrollment Form**



**IM TELECOM LLC dba INFINITI MOBILE**  
**Oklahoma Wireless Lifeline Service Application and Certification**

Mail or fax completed form signed along with proof of benefits to:  
1209 S. Frankfort Ave, Suite 200, Tulsa, Oklahoma 74120  
Customer Service: 918.960.0023

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in IM Telecom LLC dba Infiniti Mobile ("the Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

**One Lifeline service per household disclosures:** Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☐ **By checking this box, I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit from True Wireless, Terracom, Cox, AT&T, Easy Wireless, YourTel, DartPhone, Assist Wireless, Tag Mobile or any carrier.**

**Customer eligibility certification:** I hereby certify that I participate in at least one of the following programs (check one):

- |  |   |
|--|---|
| <input type="checkbox"/> 1. Supplemental Nutrition Assistance Program (SNAP)   | <input type="checkbox"/> 8. Vocational Rehabilitation (including Hearing Impaired)    |
| <input type="checkbox"/> 2. Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> 9. Bureau of Indian Affairs General Assistance (BIA)         |
| <input type="checkbox"/> 3. Medicaid   | <input type="checkbox"/> 10. Head Start (meeting income qualifying standards)         |
| <input type="checkbox"/> 4. National School Lunch Program's free lunch program | <input type="checkbox"/> 11. Temporary Assistance for Needy Families (TANF)           |
| <input type="checkbox"/> 5. Supplemental Security Income (SSI)                 | <input type="checkbox"/> 12. OK Sales Tax Relief                                      |
| <input type="checkbox"/> 6. Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> 13. Food Distribution Program on Indian Reservations (FDPIR) |
| <input type="checkbox"/> 7. Tribally Administered TANF (TATNF)                 | <input type="checkbox"/> 14. Income at or below 135% of Federal Poverty Guidelines    |

**Tribal eligibility:**

☐ I hereby certify that I reside on Federally-recognized Tribal lands.

**Customer Application Information:**

First Name: \_\_\_\_\_ Middle Initial: \_\_\_\_\_ Last Name: \_\_\_\_\_

Date of Birth: Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

Social Security Number (or Tribal ID): \_\_\_\_\_ Driver License/State ID: \_\_\_\_\_

If Qualifying for Lifeline by Income, number of Individuals in Household: \_\_\_\_\_

Home Telephone Number: \_\_\_\_\_

Residential Address (P.O. Box NOT sufficient)

Address \_\_\_\_\_ Apt # \_\_\_\_\_ City \_\_\_\_\_

State: OKLAHOMA Zip Code: \_\_\_\_\_

Address is (choose one): ☐ Permanent ☐ Temporary

Billing Address (if different from Residential Address) (P.O. Box is sufficient)

Address \_\_\_\_\_ Apt # \_\_\_\_\_ City \_\_\_\_\_

State: OKLAHOMA Zip Code: \_\_\_\_\_

**Multiple households sharing and address:**

- ☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

**Activation and usage requirement disclosures:** This service is a prepaid service and you must personally activate it by calling 918.960.0023. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

- ☐ I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

**Authorizations:**

- ☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

**Additional certifications:** I hereby certify, under penalty of perjury, that (check each box):

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required. My household income is at or below the amount listed below for my state. \$ \_\_\_\_\_
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ☐ The address listed below is my primary residence, not a second home or business
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days
- ☐ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ☐ The information contained in this certification form is true and correct to the best of my knowledge
- ☐ IM Telecom LLC dba Infiniti Mobile can port my number anytime without notice from one MVNE to another MVNE, Infiniti Mobile will text message you if this is to happen. You will continue to receive the same rate plan and your line is valid 12 months from signup.

**Applicant's Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):**

**Documents Acceptable Proof for Income-Eligibility (check 1):**

- ☐ The prior year's state, federal, or Tribal tax return,  
☐ Current income statement from an employer or paycheck stub,  
☐ A Social Security statement of benefits,  
☐ A Veterans Administration statement of benefits,  
☐ A retirement/pension statement of benefits,  
☐ An Unemployment/Workmen's Compensation statement of benefits,  
☐ Federal or Tribal notice letter of participation in General Assistance, or  
☐ A divorce decree, child support award, or other official document containing income information for at least three months time.

**OK Income Guidelines**

- ☐ \$ 15,755  
☐ \$ 21,236  
☐ \$ 26,717  
☐ \$ 32,198  
☐ \$ 37,679  
☐ \$ 43,160

\$5,481 each additional

REP/AGENT  
SIGNATURE

APPLICANT ACCOUNT NUMBER \_\_\_\_\_

Expiration Date of Proof Documents: \_\_\_\_\_

**Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):**

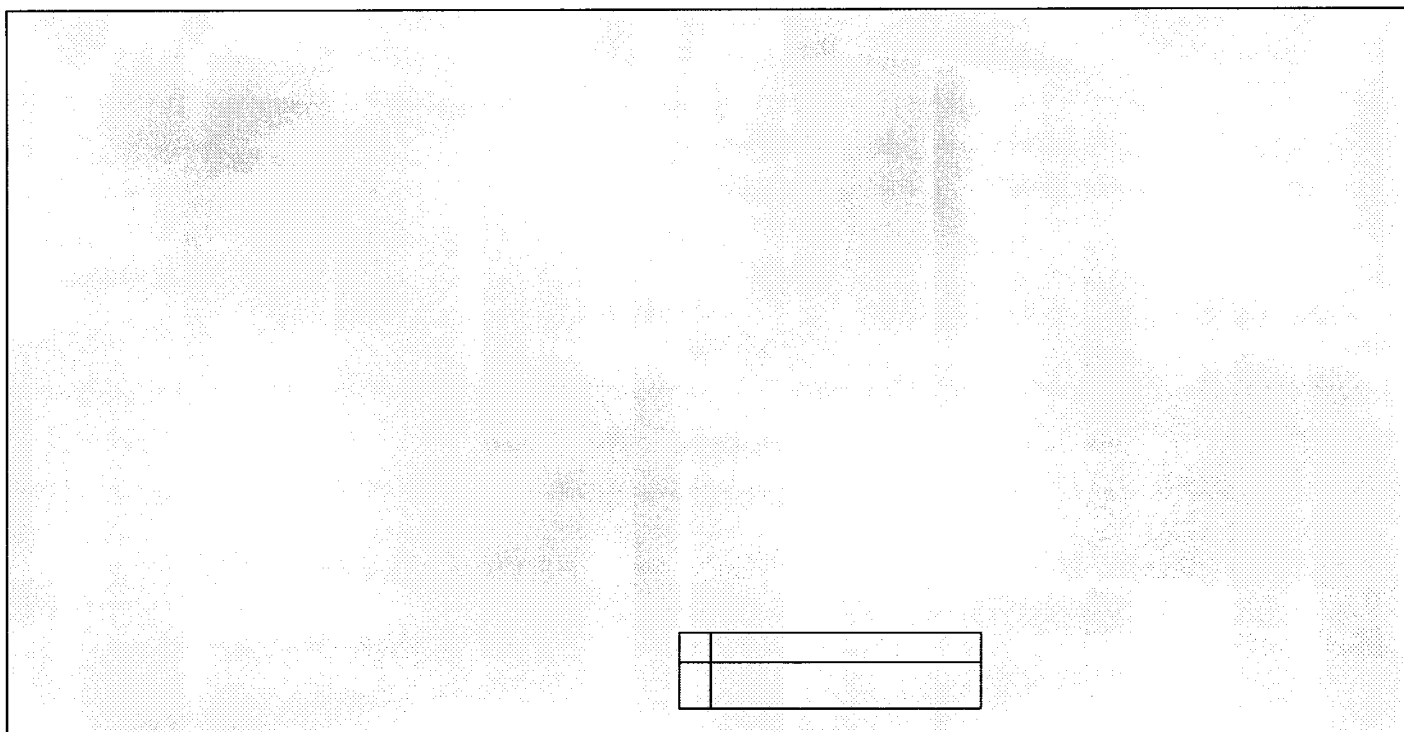
**List A - Choose 1**

- ☐ 1. Supplemental Nutrition Assistance Program (SNAP)  
☐ 2. Section 8 Federal Public Housing Assistance (FPHA)  
☐ 3. Medicaid  
☐ 4. National School Lunch Program's free lunch program  
☐ 5. Supplemental Security Income (SSI)  
☐ 6. Low Income Home Energy Assistance Program (LIHEAP)  
☐ 7. Tribally Administered TANF (TATNF)  
☐ 8. Vocational Rehabilitation (including Hearing Impaired)  
☐ 9. Bureau of Indian Affairs General Assistance (BIA)  
☐ 10. Head Start (meeting income qualifying standards)  
☐ 11. Temporary Assistance for Needy Families (TANF)  
☐ 12. OK Sales Tax Relief  
☐ 13. Food Distribution Program on Indian Reservations (FDPIR)

**List B - Choose 1:**

- ☐ Program participation card/document (Last 4 Digits \_\_\_\_\_)  
☐ Prior year's statement of benefits (Last 4 Digits \_\_\_\_\_)  
☐ Notice letter of participation (Last 4 Digits \_\_\_\_\_)  
☐ Other official document evidencing participation  
Type \_\_\_\_\_ Last 4 Digits \_\_\_\_\_






**EXHIBIT 4**

**Infiniti Mobile's FCC-Approved Compliance Plan**

**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

**WASHINGTON HARBOUR, SUITE 400**

**3050 K STREET, NW**

**WASHINGTON, D.C. 20007-5108**

(202) 342-8400

NEW YORK, NY  
LOS ANGELES, CA

CHICAGO, IL  
STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES  
MUMBAI, INDIA

FACSIMILE

(202) 342-8451

www.kelleydrye.com

DIRECT LINE: (202) 342-8544

EMAIL: jheitmann@kelleydrye.com

July 5, 2012

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: IM Telecom, LLC d/b/a Infiniti Mobile Revised Compliance Plan; WC  
Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On April 16, 2012, IM Telecom, LLC d/b/a Infiniti Mobile ("IM Telecom") submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.<sup>1</sup> On June 7, 2012 and June 18, 2012, IM Telecom submitted a revised Compliance Plan to provide additional details.

IM Telecom has further revised its Compliance Plan to: 1) confirm in footnote 3 that IM Telecom will follow the requirements of its Compliance Plan in all states where it provides Lifeline service and receives reimbursements from the federal Low-Income Fund, including in any state where the public utilities commission determines that IM Telecom provides service using its own facilities for purposes of a state universal service program; 2) note in Section I.B. that IM Telecom personnel will fill in, where available, the last four digits of an account or other identifying number on applicants' proof of eligibility document, the date of the proof document and the expiration of the proof document; 3) revise its Lifeline application/certification forms included in Exhibit A to collect such information on the proof of eligibility document; 4) provide in Exhibit B an income eligibility worksheet that will be used

<sup>1</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary  
July 5, 2012  
Page Two

with applicants that apply for Lifeline service based on income; and 5) discuss further efforts that IM Telecom will undertake to prevent duplicate enrollments by participating in a pooled external duplicates database (Section I.F.).

IM Telecom hereby re-submits its complete Compliance Plan with the above revisions. Based on the minor nature of these changes, IM Telecom reiterates its request for expeditious approval of its Compliance Plan. This letter and revised Compliance Plan is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann  
Joshua T. Guyan

*Counsel to IM Telecom, LLC d/b/a Infiniti  
Mobile*

cc: Kim Scardino  
Divya Shenoy  
Garnet Hanly

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of IM Telecom, LLC d/b/a Infiniti Mobile  Telecommunications Carriers Eligible to Receive Universal Service Support  Lifeline and Link Up Reform and Modernization	  WC Docket No. 09-197   WC Docket No. 11-42
---	---

**IM TELECOM, LLC d/b/a INFINITI MOBILE  
COMPLIANCE PLAN**

IM Telecom, LLC d/b/a Infiniti Mobile (“IM Telecom” or the “Company”),<sup>1</sup> through its undersigned counsel, hereby respectfully submits and requests expeditious treatment of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.<sup>2</sup>

IM Telecom commends the Commission’s commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including

<sup>1</sup> The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Infiniti Mobile (dba), HJS Inc. (affiliate), MWW LLC (affiliate), WWUSA LLC (affiliate).

<sup>2</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) (“*Lifeline Reform Order*”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

Lifeline customers. The Company will comply with 911 requirements as described below and it is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier (“ETC”) in the Lifeline program.<sup>3</sup>

IM Telecom will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally.<sup>4</sup> This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Company will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low-Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how the Company will

---

<sup>3</sup> See *Lifeline Reform Order*, ¶ 368. Although the Company qualifies for and seeks to avail itself of the Commission’s grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. IM Telecom will follow the requirements of the Commission’s Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund, including in any state where the public utilities commission determines that IM Telecom provides service using its own facilities for purposes of a state universal service program.

<sup>4</sup> In addition, this Compliance Plan is consistent with the compliance plan filed by Global Connection Inc. of America. See Global Connection of America Inc. Compliance Plan, WC Docket Nos. 09-197, 11-42 (Apr. 30, 2012). The Global Connection compliance plan was approved on May 25, 2012. See Public Notice, DA 12-828.

offer Lifeline services, the geographic areas in which it will offer services, and a detailed description of the Company's Lifeline service plan offerings.

**ACCESS TO 911 AND E911 SERVICES**<sup>5</sup>

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.<sup>6</sup> The Company will comply with these conditions when it begins providing service.

IM Telecom will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Company customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining.

IM Telecom's will provide access to 911 and E911 services for all customers. The Company will use Verizon Wireless and Sprint as its underlying network providers/carriers.<sup>7</sup> Verizon Wireless and Sprint route 911 calls from the Company's customers in the same manner as 911 calls from Verizon Wireless's and Sprint's own

---

<sup>5</sup> See Compliance Plan Public Notice at 3.

<sup>6</sup> See *Lifeline Reform Order*, ¶ 373.

<sup>7</sup> IM Telecom will receive minutes from its affiliate WWUSA, LLC, which purchases minutes from Ready Mobile, which, in turn, purchases minutes from Verizon Wireless and Sprint.

retail customers. To the extent that Verizon Wireless and Sprint are certified in a given PSAP territory, this 911 capability will function the same for the Company. IM Telecom also will enable 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. Finally, the Company will transmit all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

**E911-Compliant Handsets.** IM Telecom will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. The Company will use phones from Verizon Wireless and Sprint that have been through a stringent certification process with Verizon Wireless and Sprint, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

### **COMPLIANCE PLAN**

#### **I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE<sup>8</sup>**

##### **A. Policy**

IM Telecom will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

---

<sup>8</sup> See Compliance Plan Public Notice at 3.



Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

**B. Eligibility Determination**

Although IM Telecom is not yet providing Lifeline service, the Company expects that the vast majority of its Lifeline customer enrollment will be done in-person, as opposed to over the phone or the Internet. IM Telecom will enroll customers at existing retail store locations owned by its affiliate MWW, LLC and at mobile outreach units, which will arrive in particular towns on a set schedule each month to enroll customers, provide live customer service support to existing subscribers and allow subscribers to make payments.

IM Telecom will use laptops and tablets to complete enrollment in real-time. The electronic order process will provide the Company the opportunity to perform several database checks in real-time during the enrollment process. Only IM Telecom employees will enroll customers in its Lifeline service – the Company will not use agents or representatives for Lifeline enrollment. IM Telecom employees must log in to the software so that the customer enrollment is automatically tagged to a particular employee. The employee must sign his or her agreement not to take part in any fraud with respect to Lifeline enrollment. The employee will then advance through the

electronic windows with the prospective customer to provide disclosures, collect information and elicit certifications as detailed below. The first question that will be asked of the potential Lifeline customer is whether the customer or anyone in the customer's household is currently receiving a Lifeline benefit from any other Lifeline service provider. Employees in Oklahoma will be required to ask the potential customer whether anyone in the customer's household receives Lifeline service from YourTel, TerraCom, Assist Wireless or True Wireless. To complete the electronic enrollment, the customer signs the electronic application and the information collected is sent for several database checks, including an address verification, a geographic footprint match to the ETC's authorization to provide Lifeline service in the area, an internal duplicate check and a state database eligibility check (if available).

The electronic enrollment process includes the ability to scan customers' government-issued identification, proof of residence (if necessary because the address cannot be verified) and proof of eligibility. The proof will only be retained for a short period of time for verification and then deleted. All transfers of information and scans collected electronically are transmitted in encrypted form. When the checks described herein are completed in real-time, approved customers are enrolled and receive a handset to be activated as discussed below.

As discussed in further detail in Section I.F. below, all employees that conduct such in-person enrollments will be trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New employees will undergo an initial mandatory training session where they are given

training materials, including a compliance manual, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If IM Telecom cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, employees will review documentation establishing eligibility pursuant to the Lifeline rules.<sup>9</sup> All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.

Proof of Eligibility. Employees will be trained on acceptable documentation required to establish income-based and program-based eligibility.<sup>10</sup> Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.<sup>11</sup>

---

<sup>9</sup> See *Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B).

<sup>10</sup> See *Lifeline Reform Order*, ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/telecom-carriers/step06/default.aspx>.

<sup>11</sup> *Id.* and section 54.410(c)(1)(i)(B).

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months time.<sup>12</sup>

Employees will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.<sup>13</sup> In addition, employees will fill in, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. IM Telecom will not retain a copy of this documentation, unless required by a state.<sup>14</sup> Where the employee concludes that proffered documentation is insufficient to establish such eligibility, the Company will deny the associated application and inform the applicant of the reason for such rejection. In the event that an employee cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel at IM Telecom's corporate headquarters in Tulsa, Oklahoma.

De-Enrollment for Ineligibility. If IM Telecom has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company

---

<sup>12</sup> See *Lifeline Reform Order*, ¶101; section 54.410.(b)(1)(i)(B).

<sup>13</sup> See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

<sup>14</sup> See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.<sup>15</sup> A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form.

### **C. Subscriber Certifications for Enrollment**

The Company will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to IM Telecom employees as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.<sup>16</sup> The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.<sup>17</sup> Applicants that seek to enroll based on income eligibility will be referred to a worksheet showing the Federal Poverty Guidelines by household size.<sup>18</sup> Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission, including

---

<sup>15</sup> See *Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

<sup>16</sup> *Lifeline Reform Order*, ¶ 61; section 54.410(a).

<sup>17</sup> See Model Application/Certification Form, included as Exhibit A. See Compliance Plan Public Notice at 3.

<sup>18</sup> See Income Eligibility Worksheet, included as Exhibit B.

the required proof of eligibility. Any evidentiary documentation submitted with the application/certification is used strictly to verify a consumer's eligibility to participate in the Lifeline program. Upon approval of the customer's application, such proof of eligibility is either returned to the customer or destroyed and is not retained by IM Telecom, as previously stated in Section I.B. above. In addition, employees will verbally explain the certifications to consumers when they are enrolling in person or over the phone.<sup>19</sup>

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.<sup>20</sup>

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.<sup>21</sup>

---

<sup>19</sup> See *Lifeline Reform Order*, ¶ 123.

<sup>20</sup> See *Lifeline Reform Order*, ¶ 121; section 54.410(d)(1).

<sup>21</sup> See section 54.405(c).

In addition, the Company will notify the applicant that the Lifeline service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.<sup>22</sup>

Information Collection. IM Telecom also will collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient<sup>23</sup>); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.<sup>24</sup>

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,<sup>25</sup> the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days if for any reason he or

---

<sup>22</sup> See *Lifeline Reform Order*, ¶ 257.

<sup>23</sup> See *Lifeline Reform Order*, ¶ 87.

<sup>24</sup> See section 54.410(d)(2).

<sup>25</sup> See *Lifeline Reform Order*, ¶¶ 168-69; section 54.419.

she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize IM Telecom to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit. The applicant must also authorize the Company to release any records required for the administration of



the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.<sup>26</sup>

#### **D. Annual Verification Procedures**

IM Telecom will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.<sup>27</sup> Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.<sup>28</sup>

2012 Verification. The Company will re-certify the eligibility of each of its existing subscribers as of June 1, 2012 on a rolling basis by the end of 2012 and report the results to USAC by January 31, 2013.<sup>29</sup> The Company will contact its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice will explain the actions the customer must take to

---

<sup>26</sup> See Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See *id.*

<sup>27</sup> See *Lifeline Reform Order*, ¶ 120.

<sup>28</sup> See *Lifeline Reform Order*, ¶ 145.

<sup>29</sup> See *id.*, ¶ 130.

retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact IM Telecom in response to the re-certification requirement.

Verification De-Enrollment. IM Telecom will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.<sup>30</sup> The Company will give subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, the Company will de-enroll the subscriber within five business days.

#### **E.      Activation and Non-Usage**

IM Telecom will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's Lifeline service.<sup>31</sup> A customer that activates the Company's Lifeline service will affirmatively acknowledge that they are the applicant and that they have applied for, and wish to receive, Lifeline service from IM Telecom. Customers that apply for Lifeline service and receive phones in person will activate the phone and place a test call with the Company representative. Customers that receive a handset through the mail must contact IM Telecom's Welcome Activation Customer Service Center to activate service upon receipt of the handset. New activations are routed to a dedicated activation hotline where a trained Customer Support Agent validates the information contained in the customer's application, receives affirmative acknowledgment that the individual activating the

---

<sup>30</sup>      *See id.*, ¶ 142; section 54.54.405(e)(4).

<sup>31</sup>      *See Lifeline Reform Order*, ¶ 257; section 54.407(c)(1).

handset is the application and that they have applied for an wish to receive Lifeline service from IM Telecom. The Customer Support Agent then activates the Lifeline service.

In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.<sup>32</sup> Subscribers can “use” the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber’s plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.<sup>33</sup>

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and IM Telecom will not request further Lifeline reimbursement for the subscriber. The Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>34</sup>

#### **F. Additional Measures to Prevent Waste, Fraud and Abuse**

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, the Company will implement measures and procedures to prevent duplicate Lifeline benefits

---

<sup>32</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

<sup>33</sup> See *Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

<sup>34</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

In addition to checking the database when it becomes available, employees will emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers. Training materials will include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All employees interacting with existing and potential Lifeline customers will undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan. All employees receive such training upon being hired. This includes reviewing and signing the Company’s training manual and a training session. IM Telecom conducts an employee meeting once each month to refresh training and seek feedback from employees regarding enrollment. In addition, if employees have any questions regarding eligibility and enrollment, they can access an intranet site to see their management team and get contact information for questions.

Further, all employees must log in to the Company’s network to enroll customers and therefore can be tracked. The Company employs two forensic accountants that monitor accounts for irregularities, such as excessive activity. They also conduct random audits of activations whereby the forensic accountants contact customers to verify enrollment and ask questions relating to customer service.

Database. When the National Lifeline Accountability Database (“National Database”) becomes available, IM Telecom will comply with the requirements of new rule section 54.404. The Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another

ETC and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.<sup>35</sup>

One-Per-Household. IM Telecom will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household<sup>36</sup> through the use of its application and certification forms discussed above, database checks and its marketing materials discussed below. Upon receiving an application for IM Telecom's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.<sup>37</sup> If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's

---

<sup>35</sup> See *Lifeline Reform Order*, ¶ 203. The Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *Lifeline Reform Order*, ¶¶ 189-195; section 54.404(b)(6). Further, the Company will update each subscriber's information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

<sup>36</sup> A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶ 74; section 54.400(h).

<sup>37</sup> See *Lifeline Reform Order*, ¶ 78.

household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).<sup>38</sup> Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, the Company will verify with the subscriber every 90 days that the subscriber continues to rely on that address.<sup>39</sup>

In addition, IM Telecom employees will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that all Lifeline services may not be currently marketed under the name Lifeline. Employees will be instructed ask potential customers whether the customer or any other member of the customer's household is currently receiving a Lifeline-supported service. Employees enrolling Oklahoma customers will ask whether the customer is currently receiving Lifeline-supported service from YourTel, Terracom, Assist Wireless or True Wireless. Finally, at the time of enrollment, IM Telecom will check each applicant against a pooled duplicates database established by CGM, LLC.

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, IM Telecom will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible

---

<sup>38</sup> *Id.* The USAC worksheet is available at <http://www.usac.org/li/tools/news/default.aspx#582>.

<sup>39</sup> *See Lifeline Reform Order*, ¶ 89.

consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; (7) IM Telecom, LLC d/b/a Infiniti Mobile's name (the ETC); and (8) the Company's application/certification form will state that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.<sup>40</sup> These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.<sup>41</sup> This specifically includes the Company's website (<http://MyInfinitiMobile.com>) and outdoor signage.<sup>42</sup> A sample of the Company's marketing materials is included as Exhibit C. Finally, IM Telecom has stated in its marketing sample that customers are not eligible for a second Lifeline benefit if they already have Lifeline service from True Wireless, Assist Wireless, Terracom, YourTel or any other Lifeline landline or wireless provider.

#### **G. Company Reimbursements From the Fund**

To ensure that the Company does not seek reimbursement from the Fund without a subscriber's consent, IM Telecom will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the

---

<sup>40</sup> See *Lifeline Reform Order*, ¶ 275; section 54.405(c).

<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

subscribers for whom it is seeking reimbursement.<sup>43</sup> Further, the Company will submit its FCC Forms 497 on the eighth day of each month in order to be reimbursed the same month.<sup>44</sup> In addition, the Company will keep accurate records as directed by USAC<sup>45</sup> and as required by new section 54.417 of the Commission's rules.

#### **H. Annual Company Certifications**

IM Telecom will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;<sup>46</sup> (2) is in compliance with all federal Lifeline certification procedures;<sup>47</sup> and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.<sup>48</sup>

In addition, the Company will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).<sup>49</sup> Further, as discussed above, the Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>50</sup>

---

<sup>43</sup> See *Lifeline Reform Order*, ¶ 128; section 54.407(d).

<sup>44</sup> See *Lifeline Reform Order*, ¶¶ 302-306.

<sup>45</sup> See section 54.407(e).

<sup>46</sup> See *Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

<sup>47</sup> See *Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

<sup>48</sup> See section 54.416(a)(3).

<sup>49</sup> See *Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

<sup>50</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).



The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,<sup>51</sup> the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.<sup>52</sup> The Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.<sup>53</sup> Finally, the Company will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.<sup>54</sup>

#### **I. Cooperation with State and Federal Regulators**

IM Telecom has not yet provided Lifeline service, but it will cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Make available state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of

---

<sup>51</sup> See section 54.422(c).

<sup>52</sup> See *Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

<sup>53</sup> See *Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

<sup>54</sup> See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;<sup>55</sup>

- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and
- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe<sup>56</sup> is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

## **II. Description of Lifeline Service Offerings<sup>57</sup>**

IM Telecom will offer its Lifeline service in the states where it is designated as an ETC<sup>58</sup> and throughout the coverage area of its underlying providers Verizon Wireless and Sprint.<sup>59</sup> The Company's Lifeline offerings in Oklahoma will be: (1) the Oklahoma 1000 Plan, which includes 1,000 anytime minutes or text messages per month for \$1.00,<sup>60</sup> with no rollover; or (2) the Oklahoma Unlimited Plan, which includes unlimited minutes for \$6.20<sup>61</sup> with no text messaging.<sup>62</sup> Text messaging is charged as one minute of talk time

---

<sup>55</sup> The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

<sup>56</sup> See section 54.405(e)(1).

<sup>57</sup> See Compliance Plan Public Notice at 3.

<sup>58</sup> The Company has a petition for ETC designation currently pending in Oklahoma.

<sup>59</sup> IM Telecom will receive minutes from its affiliate WWUSA, LLC, which purchases minutes from Ready Mobile, which, in turn, purchases minutes from Verizon Wireless and Sprint.

<sup>60</sup> The price for this plan for non-Lifeline-eligible customers is \$35.25.

<sup>61</sup> The price for this plan for non-Lifeline-eligible customers is \$40.45.

per text message for the Oklahoma 1000 Plan. Lifeline and non-Lifeline customers will be able to purchase additional bundles of minutes in denominations of 100 minutes for \$5.00. Airtime “top-up” minutes will be available for purchase at the Company’s retail locations and on its website. Additional text messages can be purchased at the rate of \$0.05 each. Additional information regarding the Company’s plans, rates and services can be found on its website <http://MyInfinitiMobile.com>.

In addition to free voice services, the Company’s Lifeline plan will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting, Call Forwarding, 3-Way Calling, and Voicemail. All plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

IM Telecom is developing bundled packages of voice and broadband service and plans to apply to participate in the broadband pilot program outlined in the *Lifeline Reform Order*.<sup>63</sup>

### **III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation<sup>64</sup>**

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission’s Lifeline service

---

<sup>62</sup> There is no rollover for the Oklahoma Unlimited Plan, but that is irrelevant for an unlimited plan.

<sup>63</sup> See *Lifeline Reform Order*, ¶¶ 323-354.

<sup>64</sup> See Compliance Plan Public Notice at 3.

requirements.<sup>65</sup> The Compliance Plan Public Notice requires that carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

IM Telecom has not yet begun providing Lifeline or non-Lifeline wireless service. The Company is owned by Trevan Morrow, who also serves as its Chief Operating Officer. Mr. Morrow is an attorney and member of the Cherokee Indian Tribe with strong roots in Oklahoma. Mr. Morrow grew up in Oklahoma, attended Northeastern State University in Tahlequah, Oklahoma and received his Juris Doctor from the University of Oklahoma. Mr. Morrow has a legal practice in Oklahoma and has helped to establish several small companies in the state, including companies in the tech sector. Through those ventures Mr. Morrow met Gregg Iser, who serves as IM Telecom's Chief Executive Officer.

Mr. Iser has lived in Oklahoma since 1993 when he moved to the state to attend Oral Roberts University. Mr. Iser began a marketing company in Oklahoma in 1994 and entered the telecommunications business in 1998, becoming the top dealer in Oklahoma as a Sprint PCS dealer. In 1999, Mr. Iser was a top VoiceStream Wireless dealer, but in 2000 Mr. Iser sold his retail stores and became a wholesaler of wireless phones to dealers and carriers nationwide. Mr. Iser helped smaller carriers like Pioneer Cellular and

---

<sup>65</sup> See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Carolina West to re-brand wireless phones to compete against larger carriers. Altogether, Mr. Iser has more than 14 years of wireless industry experience in retail, wholesale, programming and packaging, handset distribution and customer service.

Both Mr. Morrow and Mr. Iser have strong roots in Oklahoma where IM Telecom intends to provide service as an ETC. Further, they have a combination of backgrounds and skill sets that will allow IM Telecom to provide non-Lifeline and Lifeline wireless services to eligible consumers in a manner that meets the needs of low-income consumers, including residents of Tribal lands in Oklahoma, and is compliant with the Commission's requirements.

IM Telecom is affiliated through common ownership by Mr. Morrow with several companies. MWW, LLC is an affiliate that currently operates as an outlet for retail locations enrolling Lifeline customers and activating handsets for ETCs and will operate as retail locations for the new ETC IM Telecom. Once IM Telecom is designated as an ETC, MWW, LLC retail locations will only sign up customers for IM Telecom, both Lifeline and non-Lifeline. MWW, LLC will, at that time, no longer enroll customers for other ETCs. HJS, Inc. is another affiliate, which has been in business since 1998, and it programs and activates handsets, brokers handset sales and packages handsets for wireless carriers. HJS further handles all technical issues regarding handset provisioning of the PRL (Preferred Roaming List) for the Verizon Wireless and Sprint Networks. HJS has and will continue to generate revenue streams for IM Telecom. Finally, another affiliate WWUSA, LLC resells wholesale minutes and airtime from Verizon Wireless and Sprint, through Ready Wireless, to other wireless carriers.

In addition to its access to revenue streams from its affiliates, IM Telecom has also provided handset programming, sale brokering, and packaging to non-Lifeline customers and, consequently, IM Telecom has not and will not be relying exclusively on Lifeline reimbursements for the Company's operating revenues. The Company has other substantial cash reserves from Member Manager Owners. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

Service Requirements Applicable to Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."<sup>66</sup> The Company certifies that it will comply with the service requirements applicable to the support the Company receives.<sup>67</sup> The Company will provide all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services will include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's service offerings will provide its customers with a set number of minutes of use for local service at no charge to the customer. The Company's planned Lifeline offerings include packages in Section II *supra* that can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As

---

<sup>66</sup> Compliance Plan Public Notice at 3.

<sup>67</sup> 47 C.F.R. § 54.202(a)(1).

discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, the Company will not provide toll limitation service ("TLS"). The Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.<sup>68</sup>

#### IV. Conclusion

The Company submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,



---

John J. Heitmann  
Joshua T. Guyan  
Kelley Drye & Warren, LLP  
3050 K Street, NW  
Suite 400  
Washington, D.C. 20007  
(202) 342-8544

*Counsel to IM Telecom, LLC d/b/a Infiniti  
Mobile*

July 5, 2012

---

<sup>68</sup> See *Lifeline Reform Order*, ¶ 230.

# **EXHIBIT A**





**IM Telecom LLC d/b/a Infiniti Mobile  
Oklahoma Wireless Lifeline Service Application and Certification**

**Mail or fax form completed and signed form to:**  
1855 East 15<sup>th</sup> Street, Tulsa, Oklahoma 74104  
Fax 1.918.619.9635 / Customer Service: 1.918.960.0023

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Infiniti Mobile ("the Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

**One Lifeline service per household disclosures:** Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☐ I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

**Customer Eligibility Certification:**

**OPTION 1 - ELIGIBILITY BY PROGRAM:**

I hereby certify that I participate in at least one of the following programs (**check one**):

- |   |  |
|---|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)   | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines     |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR)  |
| <input type="checkbox"/> Medicaid (not Medicare)                            | <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA)         |
| <input type="checkbox"/> Supplemental Security Income (SSI)                 | <input type="checkbox"/> Tribally Administered TANF (TATNF)                        |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)     | <input type="checkbox"/> Head Start (meeting income qualifying standards) (Tribal) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> National School Lunch Program's free lunch program        |

**OPTION 2 - ELIGIBILITY BY INCOME:**

How many people are in your household? \_\_\_\_\_

# of people	Total Annual Income at:	# of people	Total Annual Income at:	# of people	Total Annual Income at:
1 Person	\$14,702	3 People	\$25,016	5 People	\$35,330
2 People	\$19,859	4 People	\$30,173	Each Additional	\$5,157

To qualify for income eligibility, you must provide copies of one or more of the documents listed below. If you provide documentation that does not cover a full year (such as current pay stubs), you must submit three (3) consecutive months of the same type of document within the current calendar year.

- |   |  |
|---|--|
| • Prior year's state, federal or tribal tax return  | • Retirement/Pension benefit statement       |
| • Unemployment/Workers Compensation benefits statement  | • Divorce decree or child support document   |
| • Social Security benefits statement  | • Veterans Administration benefits statement |
| • Current income statement from employer or paycheck stub   |  |
| • Federal or tribal notice letter of participation in Bureau of Indian Affairs General Assistance |  |

## Customer Application Information:

Name: \_\_\_\_\_  
First Middle Last

Date of Birth: \_\_\_\_/\_\_\_\_/\_\_\_\_

Last Four Digits of Social Security Number (or Tribal ID Number): \_\_\_\_\_

If Qualifying for Lifeline by Income, number of Individuals in Household: \_\_\_\_\_

Home Telephone Number (if available): (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

### Residential Address (P.O. Box NOT sufficient)

Address: \_\_\_\_\_ Apt: \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_

State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Address is (choose one): ☐ Permanent ☐ Temporary

### Billing Address (if different from Residential Address) (P.O. Box is sufficient)

Address: \_\_\_\_\_ Apt: \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_

State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

### Tribal eligibility:

☐ I hereby certify that I reside on Federally-recognized Tribal lands.

### Multiple households sharing and address:

☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling 1.918.960.0023. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

☐ I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

### Authorizations:

☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

**Additional certifications: I hereby certify, under penalty of perjury, that (check each box):**

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ☐ The address listed below is my primary residence, not a second home or business
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days
- ☐ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ☐ The information contained in this certification form is true and correct to the best of my knowledge

**Applicant's Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

- In order for your Inifiniti Mobile Lifeline account to remain active, we require that you use your Inifiniti Mobile Lifeline supported wireless service at least once every 60 days.
- You can use the service by completing an outbound call, purchasing minutes from Inifiniti Mobile to add to your plan, answering an incoming call from someone other than Inifiniti Mobile or responding to a direct contact from Inifiniti Mobile confirming that you want to continue receiving the service.

### **For Agent Use Only**

(check the appropriate boxes for the proof of eligibility viewed and provide information requested; do not copy or retain documentation):

#### **Documents Acceptable Proof for Income-Eligibility: (check 1)**

- ☐ The prior year's state, federal, or Tribal tax return,
- ☐ Current income statement from an employer or paycheck stub,
- ☐ A Social Security statement of benefits,
- ☐ A Veterans Administration statement of benefits,
- ☐ A retirement/pension statement of benefits,
- ☐ An Unemployment/Workmen's Compensation statement of benefits,
- ☐ Federal or Tribal notice letter of participation in General Assistance, or
- ☐ A divorce decree, child support award, or other official document containing income information for at least three months time.

#### **Documents Acceptable Proof for Program-Eligibility: (choose 1 from each list A and B below)**

##### **List A - (Choose 1)**

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Medicaid (not Medicare)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ Head Start (meeting income qualifying standards) (Tribal)
- ☐ Tribally Administered TANF (TATNF)
- ☐ National School Lunch Program's free lunch program
- ☐ Food Distribution Program on Indian Reservations (FDPIR)
- ☐ Bureau of Indian Affairs General Assistance (BIA)

##### **List B - (Choose 1)**

- ☐ Program participation card/document
- ☐ Prior year's statement of benefits
- ☐ Notice letter of participation
- ☐ Other official document evidencing participation

Last 4 digits of Document from List B: \_\_\_\_\_

Date of Proof Document: \_\_\_\_/\_\_\_\_/\_\_\_\_

Expiration Date of Proof Document: \_\_\_\_/\_\_\_\_/\_\_\_\_

Applicant Account Number \_\_\_\_\_

**Agent Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## **EXHIBIT B**



## **Lifeline Service Application Income Eligibility Worksheet**

Individuals in all states are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

HOUSEHOLD SIZE	INCOME LEVEL
1	\$15,080
2	\$20,426
3	\$25,772
4	\$31,118
5	\$36,464
6	\$41,810
7	\$47,156
8	\$52,502
For each additional person	Add \$5,346

**Applicants must list the number of individuals in the applicant's household on the Lifeline application form.** Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- the prior year's state, federal, or Tribal tax return
- current income statement from an employer or paycheck stub
- a Social Security statement of benefits
- a Veterans Administration statement of benefits
- a retirement/pension statement of benefits
- an Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- a divorce decree, child support award, or other official document containing income information for at least three months time

This is a Lifeline service provided by IM Telecom, LLC dba Infiniti Mobile. Lifeline is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wireline. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Consumers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a non-transferable benefit. Lifeline customers may not transfer their benefits to any other person.

# **EXHIBIT C**



► Store Hours:  
Monday- Saturday  
12pm-6pm



► FREE ACTIVATION  
NO CREDIT CHECK  
NO CONTRACT  
GOOD FOR 12 MONTHS



► [www.MYINFINITIMOBILE.com](http://www.MYINFINITIMOBILE.com)  
918.960.0023

INFINITI

June 15, 2012

## YOU QUALIFY IN OKLAHOMA FOR LIFELINE GOVERNMENT ASSISTANCE SERVICE IF YOU RECEIVE ANY GOVERNMENT ASSISTANCE\* INCLUDING?

1. Food Stamps/ Supplemental Nutrition Assistance Program (SNAP)
2. Federal Public Housing Assistance / Section 8
3. Medicaid
4. National School Lunch Free Program (residents of Tribal Lands only)
5. Supplemental Security Income (SSI)
6. Low Income Home Energy Assistance Program (LIHEAP)
7. Temporary Assistance for Needy Families (TANF)
8. Vocational Rehabilitation (including hearing impaired)
9. Bureau of Indian Affairs General Assistance
10. Head Start (income qualifying / residents of Tribal Lands only)
11. Tribally Administered TANF
12. OK Sales Relief

\*Only eligible consumers may enroll in the program. Proof of eligibility is required, which may consist of an eligible program card or statement of benefits.

## Lifeline Service Plans Available:

### **Oklahoma Lifeline 1000 Plan**

1000 Minutes or Texts, \$1+taxes

### **Oklahoma Lifeline Unlimited**

Unlimited Minutes, No Text, \$6.20 + taxes



## ONE LIFELINE SERVICE per household disclosures:

Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. In Oklahoma, if you have Lifeline service with True Wireless, Assist Wireless, TerraCom, YourTel, or any other Lifeline landline or wireless provider, you may not receive a second Lifeline benefit. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government. Please visit store for full details. IM Telecom LLC, dba Infiniti Mobile is an Eligible Telecommunications Carrier (ETC). 111 West 5th Street, Tulsa, Oklahoma 74103 918 960 0023

**EXHIBIT 5**

**Sample Advertisement**



## Locations

### Pine & Lewis Ave

1624 N. Lewis

918.240.1160

Mon - Sat 12pm-6PM

### 43rd & Mingo Rd

4331 S. Mingo Rd

918.210.4176

Mon - Sat 12pm-6PM



918.960.0023

[www.infinitemobile.com](http://www.infinitemobile.com)

\*THE ELIGIBLE TELECOM CARRIER IS IM TELECOM LLC DBA INFINITI MOBILE

SNAP, Medicaid, SSI, Bureau of Indian Affairs Card, Section 8, National School Lunch Free Program, LIHEAP, TANF, Vocational Rehabilitation, BIA Assistance, Head Start, Tribally administered TANF, OK Sales Relief, FDPIR, Income at or below 135% of Federal Poverty Guidelines. See store for more details.

# INFINITI MOBILE



## FREE CELL PHONE

**\$1/Month\*** 750 Talk Plus 1000 Text (or 1000 talk only)

**NO CREDIT CHECK • NO CONTRACT**

\* Lifeline is a government assistance program. Only eligible consumers may enroll in the program. Proof of eligibility is required which may consist of an eligible program card or statement of benefits. Lifeline benefits are limited to a single line of service per household. Lifeline benefits are non-transferable.

# INFINITI MOBILE

*Evolve 2*

## OKLAHOMA LIFELINE Unlimited

- Unlimited Talk
- Unlimited Text & MMS
- Unlimited Data 3G  
(1gb of 4G Data included)

# ONLY

**NO CONTRACT • NO CREDIT CHECK**

IM Telecom LLC dba Infiniti Mobile is a provider of Lifeline. Lifeline is a government assistance program. Only eligible consumers may enroll in Lifeline and documentation of income or program participation is required for enrollment. Lifeline is non-transferable and limited to one service per household. Any free cell phone offering is that of Infiniti Mobile and not the Lifeline program. See our Terms and FAQs pages for details.

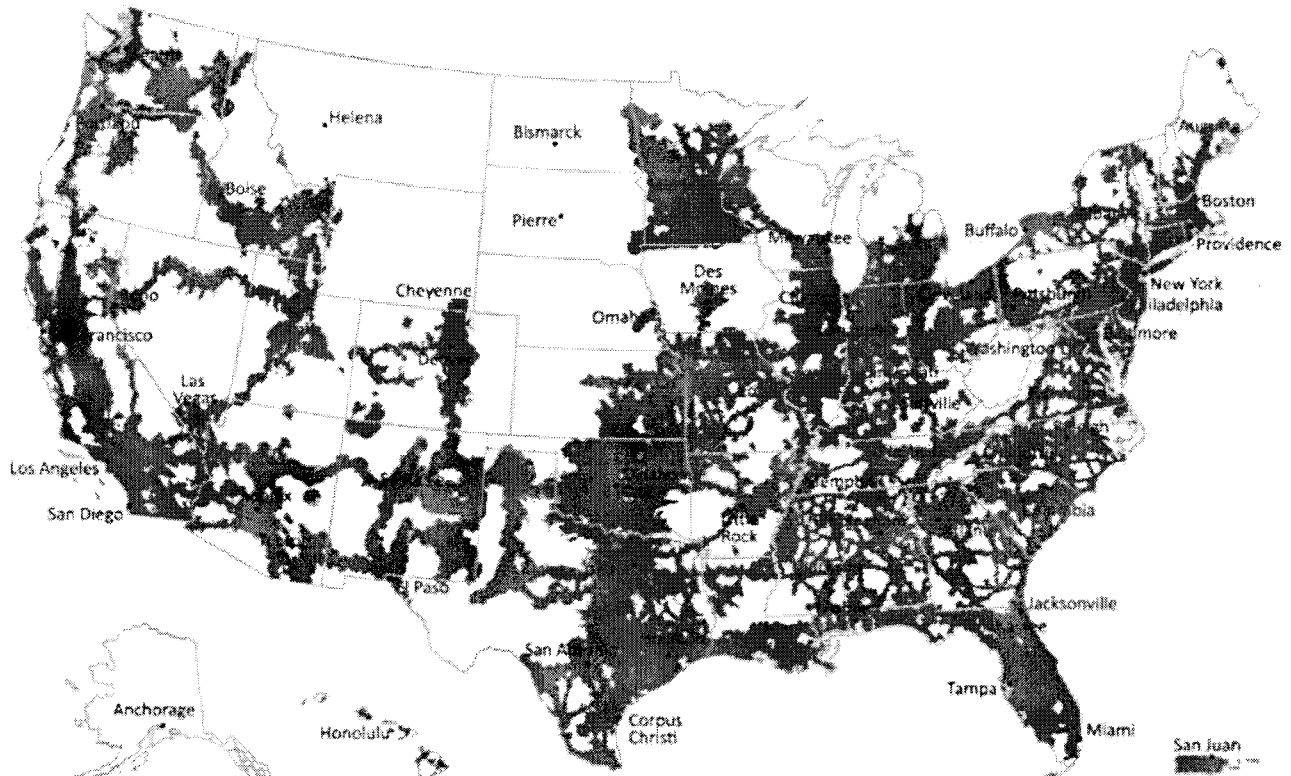


Phone Cost only **\$40**

4" WVGA touchscreen

5MP camera

Android™ 4.4



**EXHIBIT 6**

**Coverage Area**

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85001	Phoenix	AZ	
85002	Phoenix	AZ	
85003	Phoenix	AZ	
85004	Phoenix	AZ	
85005	Phoenix	AZ	
85006	Phoenix	AZ	
85007	Phoenix	AZ	
85008	Phoenix	AZ	
85009	Phoenix	AZ	
85010	Phoenix	AZ	
85011	Phoenix	AZ	
85012	Phoenix	AZ	
85013	Phoenix	AZ	
85014	Phoenix	AZ	
85015	Phoenix	AZ	
85016	Phoenix	AZ	
85017	Phoenix	AZ	
85018	Phoenix	AZ	
85019	Phoenix	AZ	
85020	Phoenix	AZ	
85021	Phoenix	AZ	
85022	Phoenix	AZ	
85023	Phoenix	AZ	
85024	Phoenix	AZ	
85025	Phoenix	AZ	
85026	Phoenix	AZ	
85027	Phoenix	AZ	
85028	Phoenix	AZ	
85029	Phoenix	AZ	
85030	Phoenix	AZ	
85031	Phoenix	AZ	
85032	Phoenix	AZ	
85033	Phoenix	AZ	
85034	Phoenix	AZ	
85035	Phoenix	AZ	
85036	Phoenix	AZ	
85037	Phoenix	AZ	
85038	Phoenix	AZ	
85039	PHOENIX	AZ	
85040	Phoenix	AZ	
85041	Phoenix	AZ	
85042	Phoenix	AZ	
85043	Phoenix	AZ	
85044	Phoenix	AZ	
85045	Phoenix	AZ	
85046	Phoenix	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85048	Phoenix	AZ	
85050	Phoenix	AZ	
85051	Phoenix	AZ	
85053	Phoenix	AZ	
85054	Phoenix	AZ	
85055	Phoenix	AZ	
85060	Phoenix	AZ	
85061	Phoenix	AZ	
85062	Phoenix	AZ	
85063	Phoenix	AZ	
85064	Phoenix	AZ	
85065	Phoenix	AZ	
85066	Phoenix	AZ	
85067	Phoenix	AZ	
85068	Phoenix	AZ	
85069	Phoenix	AZ	
85070	Laveen	AZ	
85071	Phoenix	AZ	
85072	Phoenix	AZ	
85073	PHOENIX	AZ	
85074	Phoenix	AZ	
85075	Phoenix	AZ	
85076	Phoenix	AZ	
85077	PHOENIX	AZ	
85078	Phoenix	AZ	
85079	Phoenix	AZ	
85080	Phoenix	AZ	
85082	Phoenix	AZ	
85083	Phoenix	AZ	
85085	Phoenix	AZ	
85086	Phoenix	AZ	
85087	New River	AZ	
85096	Phoenix	AZ	
85097	Phoenix	AZ	
85098	Phoenix	AZ	
85099	Phoenix	AZ	
85117	Apache Junction	AZ	
85118	Apache Junction	AZ	
85119	Apache Junction	AZ	
85120	Apache Junction	AZ	
85121	Chandler	AZ	Gila River Telecomm, Inc
85122	Casa Grande	AZ	
85123	Arizona City	AZ	
85127	Queen Creek	AZ	
85128	Coolidge	AZ	Gila River Telecomm, Inc
85130	Casa Grande	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85131	Eloy	AZ	
85132	Florence	AZ	
85138	Maricopa	AZ	
85139	Maricopa	AZ	
85140	Queen Creek	AZ	
85141	Eloy	AZ	
85142	Queen Creek	AZ	
85143	Queen Creek	AZ	
85145	Red Rock	AZ	
85147	Chandler	AZ	Gila River Telecomm, Inc
85172	Stanfield	AZ	
85178	Apache Junction	AZ	
85190	Apache Junction	AZ	
85191	Coolidge	AZ	
85193	Casa Grande	AZ	
85194	Casa Grande	AZ	
85201	Mesa	AZ	
85202	Mesa	AZ	
85203	Mesa	AZ	
85204	Mesa	AZ	
85205	Mesa	AZ	
85206	Mesa	AZ	
85207	Mesa	AZ	
85208	Mesa	AZ	
85209	Mesa	AZ	
85210	Mesa	AZ	
85211	Mesa	AZ	
85212	Mesa	AZ	
85213	Mesa	AZ	
85214	Mesa	AZ	
85215	Mesa	AZ	
85216	Mesa	AZ	
85217	Apache Junction	AZ	
85218	Apache Junction	AZ	
85219	Apache Junction	AZ	
85220	Apache Junction	AZ	
85221	Casa Grande	AZ	
85222	Casa Grande	AZ	Tohono O'odham Utility Authority
85223	Eloy	AZ	
85224	Chandler	AZ	
85225	Chandler	AZ	
85226	Chandler	AZ	Gila River Telecomm, Inc
85227	Queen Creek	AZ	
85228	Coolidge	AZ	
85230	Casa Grande	AZ	Tohono O'odham Utility, Authority
85231	Eloy	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85232	Florence	AZ	
85233	Gilbert	AZ	
85234	Gilbert	AZ	
85235	HAYDEN	AZ	
85236	Higley	AZ	
85237	KEARNY	AZ	
85238	Maricopa	AZ	
85239	Maricopa	AZ	
85240	Queen Creek	AZ	
85241	Eloy	AZ	
85242	Queen Creek	AZ	
85243	Queen Creek	AZ	
85244	Chandler	AZ	
85245	Red Rock	AZ	
85246	Chandler	AZ	
85247	Chandler	AZ	
85248	Chandler	AZ	Gila River Telecomm, Inc
85249	Chandler	AZ	
85250	Scottsdale	AZ	
85251	Scottsdale	AZ	
85252	Scottsdale	AZ	
85253	Paradise Valley	AZ	
85254	Scottsdale	AZ	
85255	Scottsdale	AZ	
85257	Scottsdale	AZ	
85258	Scottsdale	AZ	
85259	Scottsdale	AZ	
85260	Scottsdale	AZ	
85261	Scottsdale	AZ	
85262	SCOTTSDALE	AZ	
85263	Rio Verde	AZ	
85264	FORT MCDOWELL	AZ	
85266	Scottsdale	AZ	
85267	Scottsdale	AZ	
85268	Fountain Hills	AZ	
85269	Fountain Hills	AZ	
85271	Scottsdale	AZ	
85272	Stanfield	AZ	
85273	SUPERIOR	AZ	
85274	Mesa	AZ	
85275	Mesa	AZ	
85277	Mesa	AZ	
85278	Apache Junction	AZ	
85279	FLORENCE	AZ	
85280	Tempe	AZ	
85281	Tempe	AZ	



Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85282	Tempe	AZ	
85283	Tempe	AZ	
85284	Tempe	AZ	
85285	Tempe	AZ	
85286	Chandler	AZ	
85287	Tempe	AZ	
85289	TEMPE	AZ	
85290	TORTILLA FLAT	AZ	
85291	Coolidge	AZ	
85292	WINKELMAN	AZ	
85293	Casa Grande	AZ	
85294	Casa Grande	AZ	
85295	Gilbert	AZ	
85296	Gilbert	AZ	
85297	Gilbert	AZ	
85298	Gilbert	AZ	
85299	Gilbert	AZ	
85301	Glendale	AZ	
85302	Glendale	AZ	
85303	Glendale	AZ	
85304	Glendale	AZ	
85305	Glendale	AZ	
85306	Glendale	AZ	
85307	Glendale	AZ	
85308	Glendale	AZ	
85309	Luke AFB	AZ	
85310	Glendale	AZ	
85311	Glendale	AZ	
85312	Glendale	AZ	
85313	GLENDALE	AZ	
85318	Glendale	AZ	
85320	AGUILA	AZ	
85321	AJO	AZ	
85322	Arlington	AZ	
85323	Avondale	AZ	
85324	BLACK CANYON CITY	AZ	
85325	BOUSE	AZ	
85326	Buckeye	AZ	
85327	Cave Creek	AZ	
85328	Cibola	AZ	
85329	Avondale	AZ	
85331	Cave Creek	AZ	
85332	CONGRESS	AZ	
85333	Dateland	AZ	
85334	Cibola	AZ	
85335	El Mirage	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85336	Somerton	AZ	
85337	Gila Bend	AZ	
85338	Goodyear	AZ	
85339	Laveen	AZ	Gila River Telecomm, Inc
85340	Litchfield Park	AZ	
85341	LUKEVILLE	AZ	
85342	Morristown	AZ	
85343	Palo Verde	AZ	
85344	PARKER	AZ	
85345	Peoria	AZ	
85346	Parker	AZ	
85347	ROLL	AZ	
85348	SALOME	AZ	
85349	Somerton	AZ	
85350	Somerton	AZ	
85351	Sun City	AZ	
85352	Wellton	AZ	
85353	Tolleson	AZ	
85354	Tonopah	AZ	
85355	Waddell	AZ	
85356	WELLTON	AZ	
85357	WENDEN	AZ	
85358	Wickenburg	AZ	
85359	Parker	AZ	
85360	Lake Havasu City	AZ	
85361	Wittmann	AZ	
85362	YARNELL	AZ	
85363	Youngtown	AZ	
85364	Yuma	AZ	
85365	Yuma	AZ	
85366	Yuma	AZ	
85367	Yuma	AZ	
85369	Yuma	AZ	
85371	POSTON	AZ	
85372	Sun City	AZ	
85373	Sun City	AZ	
85374	Surprise	AZ	
85375	Sun City West	AZ	
85376	Sun City West	AZ	
85377	Cave Creek	AZ	
85378	Surprise	AZ	
85379	Surprise	AZ	
85380	Peoria	AZ	
85381	Peoria	AZ	
85382	Peoria	AZ	
85383	Peoria	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85385	Peoria	AZ	
85387	Surprise	AZ	
85388	Surprise	AZ	
85390	WICKENBURG	AZ	
85392	Avondale	AZ	
85395	Goodyear	AZ	
85396	Buckeye	AZ	
85501	GLOBE	AZ	
85502	Globe	AZ	
85531	CENTRAL	AZ	
85532	Miami	AZ	Gila River Telecomm, Inc
85533	CLIFTON	AZ	
85534	DUNCAN	AZ	
85535	EDEN	AZ	
85536	FORT THOMAS	AZ	
85539	MIAMI	AZ	
85540	MORENCI	AZ	
85541	PAYSON	AZ	
85543	PIMA	AZ	
85544	PINE	AZ	
85545	ROOSEVELT	AZ	
85546	SAFFORD	AZ	
85547	Payson	AZ	
85548	SAFFORD	AZ	
85551	SOLOMON	AZ	
85552	THATCHER	AZ	
85553	Payson	AZ	
85554	YOUNG	AZ	
85601	ARIVACA	AZ	
85602	BENSON	AZ	
85603	Bisbee	AZ	
85605	San Simon	AZ	
85606	Cochise	AZ	
85607	DOUGLAS	AZ	
85608	Douglas	AZ	
85609	Cochise	AZ	
85610	ELFRIDA	AZ	
85611	ELGIN	AZ	
85613	Fort Huachuca	AZ	
85614	Green Valley	AZ	
85615	HEREFORD	AZ	
85616	Huachuca City	AZ	
85617	MC Neal	AZ	
85618	Mammoth	AZ	
85619	Mount Lemmon	AZ	
85620	Bisbee	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85621	NOGALES	AZ	
85622	Green Valley	AZ	
85623	Oracle	AZ	
85624	PATAGONIA	AZ	
85625	PEARCE	AZ	
85626	Douglas	AZ	
85627	Benson	AZ	
85628	Nogales	AZ	
85629	Sahuarita	AZ	
85630	Saint David	AZ	
85631	San Manuel	AZ	
85632	San Simon	AZ	
85633	SASABE	AZ	
85635	Sierra Vista	AZ	
85636	Sierra Vista	AZ	
85637	SONOITA	AZ	
85638	TOMBSTONE	AZ	
85640	Tumacacori	AZ	
85641	Vail	AZ	
85643	WILLCOX	AZ	
85644	Willcox	AZ	
85645	Amado	AZ	
85646	Tumacacori	AZ	
85648	Rio Rico	AZ	
85650	Sierra Vista	AZ	
85652	Tucson	AZ	
85653	Marana	AZ	
85654	Marana	AZ	
85655	Douglas	AZ	
85658	Marana	AZ	
85662	Nogales	AZ	
85670	Sierra Vista	AZ	
85671	SIERRA VISTA	AZ	
85701	Tucson	AZ	
85702	Tucson	AZ	
85703	Tucson	AZ	
85704	Tucson	AZ	
85705	Tucson	AZ	
85706	Tucson	AZ	
85707	Tucson	AZ	
85708	Tucson	AZ	
85709	Tucson	AZ	
85710	Tucson	AZ	
85711	Tucson	AZ	
85712	Tucson	AZ	
85713	Tucson	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85714	Tucson	AZ	
85715	Tucson	AZ	
85716	Tucson	AZ	
85717	Tucson	AZ	
85718	Tucson	AZ	
85719	Tucson	AZ	
85720	TUCSON	AZ	
85721	Tucson	AZ	
85722	Tucson	AZ	
85723	Tucson	AZ	
85724	Tucson	AZ	
85725	Tucson	AZ	
85726	Tucson	AZ	
85728	Tucson	AZ	
85730	Tucson	AZ	
85731	Tucson	AZ	
85732	Tucson	AZ	
85733	Tucson	AZ	
85734	Tucson	AZ	
85735	Tucson	AZ	
85736	TUCSON	AZ	
85737	Tucson	AZ	
85738	Tucson	AZ	
85739	Tucson	AZ	
85740	Tucson	AZ	
85741	Tucson	AZ	
85742	Tucson	AZ	
85743	Tucson	AZ	
85744	Tucson	AZ	
85745	Tucson	AZ	
85746	Tucson	AZ	
85747	Tucson	AZ	
85748	Tucson	AZ	
85749	Tucson	AZ	
85750	Tucson	AZ	
85751	Tucson	AZ	
85752	Tucson	AZ	
85754	Tucson	AZ	
85755	Tucson	AZ	
85756	Tucson	AZ	
85757	Tucson	AZ	
85775	TUCSON	AZ	
85777	TUCSON	AZ	
85901	SHOW LOW	AZ	
85902	SHOW LOW	AZ	
85911	CIBECUE	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85912	WHITE MOUNTAIN LAKE	AZ	
85920	ALPINE	AZ	
85922	BLUE	AZ	
85923	CLAY SPRINGS	AZ	
85924	CONCHO	AZ	
85925	EAGAR	AZ	
85926	FORT APACHE	AZ	
85927	GREER	AZ	
85928	HEBER	AZ	
85929	LAKESIDE	AZ	
85930	MCNARY	AZ	
85931	FOREST LAKES	AZ	
85932	NUTRIOSO	AZ	
85933	OVERGAARD	AZ	
85934	PINEDALE	AZ	
85935	PINETOP	AZ	
85936	SAINT JOHNS	AZ	
85937	SNOWFLAKE	AZ	
85938	SPRINGERVILLE	AZ	
85939	TAYLOR	AZ	
85940	VERNON	AZ	
85941	WHITERIVER	AZ	
85942	Holbrook	AZ	
86001	FLAGSTAFF	AZ	
86002	Flagstaff	AZ	
86003	Flagstaff	AZ	
86004	Flagstaff	AZ	Frontier/Navajo
86011	Flagstaff	AZ	
86015	Flagstaff	AZ	
86016	GRAY MOUNTAIN	AZ	
86017	Flagstaff	AZ	
86018	Williams	AZ	
86020	CAMERON	AZ	
86021	COLORADO CITY	AZ	
86022	FREDONIA	AZ	
86023	Williams	AZ	
86024	HAPPY JACK	AZ	
86025	Holbrook	AZ	
86028	Holbrook	AZ	
86029	Holbrook	AZ	
86031	INDIAN WELLS	AZ	
86032	Winslow	AZ	
86036	MARBLE CANYON	AZ	
86038	MORMON LAKE	AZ	
86046	WILLIAMS	AZ	
86052	NORTH RIM	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
86301	Prescott	AZ	
86302	Prescott	AZ	
86303	PRESCOTT	AZ	
86304	Prescott	AZ	
86305	PRESCOTT	AZ	
86312	Prescott Valley	AZ	
86313	Prescott	AZ	
86314	Prescott Valley	AZ	
86315	Prescott Valley	AZ	
86320	Ash Fork	AZ	
86321	BAGDAD	AZ	
86322	Camp Verde	AZ	
86323	CHINO VALLEY	AZ	
86324	CLARKDALE	AZ	
86325	Cornville	AZ	
86326	Cottonwood	AZ	
86327	Dewey	AZ	
86329	Dewey	AZ	
86330	Prescott	AZ	
86331	Clarkdale	AZ	
86332	KIRKLAND	AZ	
86333	Mayer	AZ	
86334	PAULDEN	AZ	
86335	Rimrock	AZ	
86336	SEDONA	AZ	
86337	SELIGMAN	AZ	
86338	SKULL VALLEY	AZ	
86339	Sedona	AZ	
86340	Sedona	AZ	
86341	Sedona	AZ	
86342	Rimrock	AZ	
86343	CROWN KING	AZ	
86351	Sedona	AZ	
86401	KINGMAN	AZ	
86402	Kingman	AZ	
86403	Lake Havasu City	AZ	
86404	Lake Havasu City	AZ	
86405	Lake Havasu City	AZ	
86406	LAKE HAVASU CITY	AZ	
86409	Kingman	AZ	
86411	HACKBERRY	AZ	
86412	Kingman	AZ	
86413	Golden Valley	AZ	
86426	Fort Mohave	AZ	Fort Mojave Telecomm, Inc.
86427	Fort Mohave	AZ	Fort Mojave Telecomm, Inc.
86429	Bullhead City	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
86430	Bullhead City	AZ	
86431	Kingman	AZ	
86432	LITTLEFIELD	AZ	
86433	OATMAN	AZ	
86434	PEACH SPRINGS	AZ	
86436	Topock	AZ	
86437	VALENTINE	AZ	
86438	Bullhead City	AZ	
86439	Bullhead City	AZ	
86440	Mohave Valley	AZ	Fort Mojave Telecomm, Inc.
86441	DOLAN SPRINGS	AZ	
86442	BULLHEAD CITY	AZ	
86443	TEMPLE BAR MARINA	AZ	
86444	MEADVIEW	AZ	
86445	WILLOW BEACH	AZ	
86446	Bullhead City	AZ	
86506	Ganado	AZ	Table Top Tel Company, Inc.
86508	LUPTON	AZ	
86511	Ganado	AZ	
86512	Chambers	AZ	Table Top Tel Company, Inc.
86520	BLUE GAP	AZ	
86540	NAZLINI	AZ	
86547	ROUND ROCK	AZ	
86555	Douglas	AZ	